

DOCKET FILE COPY ORIGINAL

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED  
JUN 13 1997

Federal Communications Commission  
Office of Secretary

In the Matter of )  
 )  
Advanced Television Systems and )  
Their Impact upon the Existing )  
Television Broadcast Service )

MM Docket No. 87-260

To: The Commission - Mail Stop 1170

PETITION FOR RECONSIDERATION

Table of Contents

Introduction and Summary . . . . .	2
The Commission Should Revise the Digital Allotment Table . . . . .	4
Section 307(b) Violation . . . . .	6
Sunshine Act Violation . . . . .	7
Reconsideration of Section 73.623 . . . . .	9
Early Relief for Displaced Stations . . . . .	9
Channels 60-69 . . . . .	13
Digital Operation by LPTV Stations . . . . .	14
New Permanent Class of Station . . . . .	14
Secondary Status Issue . . . . .	14
Conclusion	

No. of Copies rec'd  
List A B C D E

029

## Introduction and Summary

1. The Community Broadcasters Association ("CBA") hereby petitions for reconsideration of the *Fifth Report and Order* and the *Sixth Report and Order* in the above-captioned proceeding. CBA is the trade association of the nation's low power television ("LPTV") stations. It represents the LPTV industry in regulatory, judicial, and legislative proceedings and has previously participated actively in MM Docket No. 87-268.

2. The Commission should reconsider the digital table of allotments adopted in the *Sixth Report and Order*, because the resulting displacement of at least 160 operating LPTV stations is not required to accommodate the transition to digital television, and the destruction of so many LPTV stations will concentrate television broadcasting in large markets at the expense of smaller communities in violation of Section 307(b) of the Communications Act. The forced rapid implementation of digital broadcasting in the largest markets exacerbates the problem by curtailing the Commission's flexibility to address the LPTV displacement problem.

3. The new rules and regulations were invalidly adopted in violation of the Sunshine Act, because the Commission did not give seven days advance notice that the rules would be considered at its open meeting on April 3, 1997, and the exception to seven-day notice for emergencies does not apply.

4. If not completely invalidated because of the Sunshine Act violation, the Commission should eliminate or modify the new requirement in §73.623, which adds 19 dB of protection required from an NTSC TV station to prevent the creation of interference to a DTV signal.

5. It is also important that the Commission not leave LPTV stations in limbo and that it permit stations that appear to be irrevocably displaced to apply for new channels immediately

rather than waiting for the displacing full power digital station to file its Form 301 application. Many LPTV stations have major change construction permits which it makes no sense to implement under a cloud of uncertainty as to the timing of future displacement. Also, the timetable for full power digital implementation is too short for LPTV stations to wait for a full power filing before they start implementing their own displacement plans. Therefore, an immediate opportunity must be given for the filing of displacement applications, and that opportunity must be structured in a fair manner that maximizes the number of LPTV stations that can be accommodated.

6. Notwithstanding the Commission's anxiety to take Channels 60-69 to auction in the short-term future, these channels are critically needed to help LPTV stations move through the transition until more channels become available after analog broadcasting stops. Thus whatever the ultimate disposition of those channels may be, LPTV stations should be allowed to remain and/or to move there until the mandatory end of analog NTSC service.

7. Finally, the Commission should state now that there is no impediment to an LPTV station's converting to digital operation on its existing channel if no interference would result. Some LPTV operators wish to be at the forefront, not the tail end, of the digital conversion. They should be permitted to lead and to experiment with digital operation now, without waiting for another rule making to be initiated and completed. And the Commission must establish a permanent license status for qualified LPTV stations early on and provide for compensation for those stations who are unable to survive the displacement process.

### **The Commission Should Revise the Digital Allotment Table.**

8. The Commission produced its digital allotment table without including any penalty in the computer software for displacing an LPTV station. As CBA urged in earlier comments in this proceeding, that omission was contrary to the public interest, because it resulted in the digital program selecting many of the same channels that LPTV search programs have found for LPTV stations, when alternatives were readily available for digital use. The Commission evidently felt that it would be too difficult to introduce any new elements into its computer work, because of the complexity of the problem of doubling the number of television stations and shrinking the available spectrum at the same time. Therefore, the Commission did not even attempt to accommodate LPTV stations.

9. The Commission was wrong in concluding that attempting to accommodate LPTV stations was too complicated. CBA, whose resources are minuscule in comparison to those of the full power industry, the FCC, or virtually anyone else, undertook the effort itself. After obtaining software from the Commission,<sup>1/</sup> CBA modified the underlying database to include operating LPTV stations and added instructions to the program not to displace an operating LPTV station unless no other way were available to provide a digital channel for a full power station. CBA had much less time than the Commission or the full power industry to work with this software; but even in the short time available, CBA was able to produce an allotment table

---

<sup>1/</sup> CBA very much appreciates the cooperation it received from the Commission's Staff in working with this software. Its criticism of the digital table is directed at the policy underlying the table, not the skills or efforts of those who created the table.

that saves a substantial number of LPTV stations.<sup>2/</sup> The point is not that CBA's table is perfect but that CBA has clearly proven that it is possible to achieve the transition to digital television without ignoring LPTV stations and without wholesale displacement of the LPTV industry. CBA believes that it was arbitrary and capricious for the Commission not even to have attempted to minimize the impact of its actions on LPTV service when in fact it was possible to do so without a major investment of resources.

10. In preparation for its computer work, CBA circulated a questionnaire to as many LPTV stations as it could find, so that it could compile as accurate a database as possible with regard to what stations are actually on the air and the facilities they use.<sup>3/</sup> Based on the information gathered by CBA, the Commission's digital allotment table will have the following devastating effects:

- a. 160 operating LPTV stations displaced.<sup>4/</sup>
- b. 2,563 local programs a week lost.
- c. loss of the only local television service in 75 communities

---

<sup>2/</sup> A copy of that table is attached as Exhibit A. An earlier version of this table was previously submitted to the Commission. As the Commission is aware, the simulated annealing feature of the software allows continuing improvement the longer the program runs. Thus the version submitted with this petition is better than the one that preceded it, but there is no claim that further improvements are not possible.

<sup>3/</sup> Most people agree that the Commission's LPTV/translator database includes many stations that are not actually operating. If the Commission were to rerun its computer program, it would have to make an more official canvas of the industry than CBA did; but that canvas should be undertaken, because without doing it, the magnitude of the LPTV accommodation problem is overstated, and the Commission is unnecessarily fearful of attacking and solving the problem.

<sup>4/</sup> CBA did not attempt to compile information on the number of translators that will be displaced. There are obviously some. The service rendered by those stations is also important and should be preserved to the maximum extent possible.

- d. loss of employment for 2,051 persons
- e. loss of an investment of more than \$74 million in station construction and operation

11. If this destruction of local service, jobs, and investment can be avoided or minimized, there is no justification for destroying. Therefore, the Commission should substitute CBA's allotment table for its own or should rerun its software with a significant penalty for displacing LPTV stations.<sup>5/</sup>

### **Section 307(b) Violation**

12. Section 307(b) of the Communications Act of 1934, as amended<sup>6/</sup> requires the Commission to "make such distribution of licenses, frequencies, hours of operation, and of power among the several States and communities as to provide a fair, efficient, and equitable distribution of radio service to each of the same." That language was not modified or repealed by the Telecommunications Act of 1996. The Commission enunciated its principles for implementing the statute in the television allotment process in the *Sixth Report and Order on Television Allocations*, 41 FCC 148, 167 (1952), and has not changed those principles since. They are: (1) to provide at least one television service to all parts of the United States, (2) to provide each community with at least one television station, (3) to provide a choice of at least two television services to all parts of the United States; (4) to provide each community with at

---

<sup>5/</sup> The Commission has estimated that its table provides for 99% replication of NTSC service areas by digital stations. CBA's table is estimated to provide for 95% replication. The difference of only 4% is *de minimis* in light of the number of LPTV stations and amount of local service that CBA's table saves.

<sup>6/</sup> 47 USC §307(b).

least two television broadcast stations; and (5) any channels which remain unassigned under the foregoing priorities will be assigned to the various communities depending on the size of the population of each community, the geographical location of each community, and the number of television services available to such community from television stations located in other communities.

13. The digital television allotment table was not intended to advance the first priority, since the objective was replication of NTSC service areas rather than expanding coverage. However, the Commission clearly violated the second priority in favoring replication of existing service over the preservation of at least one local television station for each community. As indicated above, some 75 communities will lose their only local television station as a result of displacement by full power digital stations. That means that television service will become more concentrated than it is now in large markets. Such concentration is directly contrary to the statutory mandate to distribute frequencies among the several states. The Commission must create a new allotment table, like CBA's that strives to maintain the distribution of frequencies rather than reducing it.<sup>7/</sup>

### **Sunshine Act Violation**

14. The Commission adopted the *Fifth and Sixth Report and Order* at an open meeting on April 3, 1997. The Sunshine Act requires the Commission to give seven days public notice

---

<sup>7/</sup> The fact that LPTV stations are licensed on a secondary basis is not one of the factors mentioned in Section 307(b) and so is irrelevant. In any event, it is not necessary to choose between primary and secondary status where, as here, it has been demonstrated that the objective of accommodating full power stations with digital channels need not be sacrificed to avoid shutting down many LPTV stations.

of what matters will be considered at such a meeting,<sup>8/</sup> and §1.1203(a) of the Rules prohibits contacts with decision-making personnel during that seven-day period. In this case, the Sunshine Agenda notice was released on March 27, 1997, and made no mention of MM Docket No. 87-268. The notice that digital television would be considered on April 3 was first published the very same day of the meeting -- too late for any dissemination by press services or publications. Thus there was effectively no official advance notice of the meeting.

15. The Sunshine Agenda notice published on April 3 stated that "[t]he prompt and orderly conduct of the Commission's Business requires this change and no earlier announcement was possible." That cannot be so. The Chairman had stated publicly many times that he would respond to the desire of Congress to have action on digital television by April 1, so it was well-known in the industry that the April 3 meeting was the target for digital television action. The only possible reason for keeping the item off the March 27 Sunshine Agenda notice was to permit exactly the kind of *ex parte* meetings that §1.1203(a) is intended to avoid. How many such meetings and discussions were held with the full power industry, with the content unknown to CBA, is uncertain; but a Commission public notice on April 9 disclosed contact as late as the

---

<sup>8/</sup> 5 USC §552(e)(1) reads as follows: "In the case of each meeting, the agency shall make public announcements, at least one week before the meeting, of the time, place, and subject matter of the meeting, whether it is to be open or closed to the public, and the name and phone number of the official designated by the agency to respond to requests for information about the meeting. Such announcement shall be made unless a majority of the members of the agency determines by a recorded vote that agency business requires that such meeting be called at an earlier date in which case the agency shall make public announcement of the time, place, and subject matter of such meeting, and whether open or closed to the public, at the earliest practicable time."



day of the meeting itself.<sup>9/</sup> The spirit and the letter of the law were violated, and the adoption of the rules was invalid as a result.

### **Reconsideration of Section 73.623**

16. The discussion by Robert W. Fisher, attached hereto as Exhibit B, explains why the Commission should eliminate or modify the new requirement in §73.623, which adds 19 dB of protection required from an NTSC TV station to prevent the creation of interference to a DTV signal. This new regulation is not necessary to avoid interference, and it will vastly complicate the task of finding new channels for displaced LPTV stations.<sup>10/</sup>

### **Early Relief for Displaced Stations**

17. The Commission properly provided for continuation of the existing displacement application rule for LPTV stations that will have to move to a new channel if the Commission's digital allotment table remains unchanged; those stations may file applications to move to new channels without opening the door to competing applications. However, those stations are also required to wait until they have a reasonable expectation of causing interference, which at least by informal Staff interpretation means waiting until the displacing full power station files its

---

<sup>9/</sup> *Broadcasting and Cable* magazine reported on March 31, 1997, at pp. 15-16, that regulators were expected to keep talking with the industry, that the President of the NAB had met with the Commission on March 27, and that "regulators were planning to keep the issue off [the] 'sunshine' agenda to permit further discussions with the industry." The same story indicated that the Commissioners still hoped to act on April 3, making it clear that the Commission knew enough about its plans that it could have published a Sunshine Agenda notice prior to the day of the meeting. If the Commission was uncertain about its plans, the proper thing to do would have been to put the item on the agenda and then take it off at the last minute if action were not taken on April 3.

<sup>10/</sup> The discussion of engineering issues, displacement timing, and conversion to digital operation apply in many cases to TV translators as well as LPTV stations.

Form 301 application to implement digital operation. The rules must be changed to allow earlier displacement applications and to establish an orderly process for accommodating displaced stations.

18. First, however, the Commission should make it clear that if a potentially displaced LPTV station files a request to amend the full power digital allotment table so as to avoid displacement, and its proposal meets the spacing and other requirements of the digital rules, the petition will be given very favorable consideration, and there will be a strong presumption that the public interest requires a grant. A request to substitute digital allotments should not be rejected unless the full power station would be significantly worse off as a result. All channels should be considered equally desirable in determining which channel is made available to a particular full power station for digital operation.

19. If the LPTV station must change channels, the filing of Form 301 by the displacing full power station is the wrong trigger point. First, many LPTV operators currently hold construction permits for new stations or changes in existing stations and cannot reasonably be expected to invest in the cost of construction with a displacement cloud hanging over their head. Rather, they should be able to file immediately to move to a new channel. It is also undesirable to have the timing trigger for filing an LPTV displacement application under the control of another entity whose own timing may vary considerably. Some full power stations will begin digital operation soon; others will linger until the last minute. A displaced LPTV station may thus be in limbo for up to several years without knowing when it will have to move. During that time, potentially available displacement channels may be taken by others. Thus a displaced

LPTV station may lose an opportunity to save itself because the displacing full power station delays in filing its Form 301.

20. The pressure exerted by the Commission on full power stations to begin digital operation early has exacerbated the problem for displaced LPTV stations. Some full power stations have committed to digital operation before Christmas of 1998<sup>11/</sup>. The Commission has indicated that it can process digital Form 301 applications that pose no unusual issues in only a matter of days. Thus if a major market LPTV station cannot file for displacement relief until the full power station files its Form 301, the timeline on the full power side between application filing and commencement of operation could be so short that there will not be enough time for the filing and grant of an LPTV displacement application and implementation of a channel change by the LPTV station.<sup>12/</sup>

21. The problem is how to create equitable filing opportunities for LPTV stations without adverse side effects. There are at least two potential problems. One is what happens if there are not enough available channels to accommodate all the displaced LPTV stations in a market. One LPTV station should not be forced to wait on the sidelines while another applies for an available channel. On the other hand, an LPTV station should not be allowed to receive a displacement grant and then refrain from constructing on the new channel until actual digital

---

<sup>11/</sup> CBA believes that no full power digital operations should be implemented until the Commission has disposed petitions for reconsideration and the courts have disposed of appeals of the *Fifth* and *Sixth Report and Orders*. At a minimum, stations beginning digital operations should do so at their own risk, and no equities on their part should restrain the Commission's flexibility on reconsideration.

<sup>12/</sup> The LPTV processing delay could be fatal if there were mutually exclusive LPTV displacement applications.

operation forces displacement. Second, it is important that rural LPTV stations, which may have a choice of displacement channels, not take up channels that may be the only available option for urban LPTV stations; in other words, displacement relief should be structured to give both stations an equal opportunity to obtain whatever channels are available.

22. Not all LPTV operators are of the same mind on the displacement issue, but CBA wishes to suggest some general approaches to relief. First, an early opportunity must be afforded for filing for displacement relief, whether through first-come, first served, a window, or otherwise. If a filing window is opened, either the initial window should be reserved for displacement or else displacement applications should be given priority over other kinds of modification applications. Second, if two LPTV stations file for the same displacement channel, if one of the applicants is able to identify an alternative substantially equivalent channel for the other, the other should be required to amend its application to specify the alternative channel rather than the applications being sent to lottery.<sup>13/</sup> The amendments should be permitted without requiring a new window.<sup>14/</sup>

23. Once an opportunity has been afforded for early displacement relief, the Commission should also afford an opportunity for LPTV stations to file applications to take advantage of the

---

<sup>13/</sup> Likewise, if an applicant is able to identify an alternative channel for itself to avoid mutual exclusivity, it should be permitted to amend to that channel.

<sup>14/</sup> There is precedent for allowing a new channel to be introduced by amendment in that the Commission permits counterproposals in FM and TV allotment proceedings. The Commission sometimes even searches for a new channel itself to avoid mutual exclusivity among allotment proposals and allots the new channel without a new comment opportunity in the rule making.

new effective radiated power limits adopted in this proceeding.<sup>15/</sup> Many stations could substantially improve their service to the public under the new ERP rule and are anxious to do so at an early date.<sup>16/</sup>

### **Channels 60-69**

24. The truncation of the television spectrum adopted by the Commission in this proceeding has of course made the LPTV preservation problem much more difficult to deal with than it would have been without such truncation. As the Commission is well aware, the problem is worse during the transition, when every full power station is operating on two channels, than it will be afterwards, when each station reverts to single-channel operation. LPTV stations are heavily concentrated on Channels 60-69, and many displaced from lower channels will have nowhere to go except Channels 60-69 during the transition. It is critical that the Commission allow LPTV stations to continue operating on, or to migrate temporarily to, Channels 60-69 as long as full power stations are authorized to operate on two channels. Any reallocation of Channels 60-69 should take this timing issue into account, and any spectrum sold at auction should be sold with a caveat that use of some of it may have to wait until the end of the digital transition period.<sup>17/</sup>

---

<sup>15/</sup> CBA also appreciates the need of the translator industry for a window to allow the expansion of the TV translator service to allow wider distribution of FOX and the new, rapidly-growing WB and UPN networks to rural areas. An filing opportunity for new translator applications in rural areas where spectrum is not scarce would be appropriate.

<sup>16/</sup> Some stations can improve service through a minor change where they maintain ERP but install a more powerful transmitter and use a lower gain antenna. However, many can also increase their coverage under the new ERP rule.

<sup>17/</sup> Not all nine channels will be needed at any one location for transitional television operations; so if there is an urgent need to accommodate public safety operations, it should be possible to do so during the transition period.

### **Digital Operation by LPTV Stations**

25. The Commission has deferred until later the question of digital operation by LPTV stations, but there is no reason to preclude such operation now. Some LPTV operators wish to be at the forefront of digital experimentation and are prepared to convert to digital operation on their present channel now.<sup>18/</sup> One of CBA's engineering consultants believes that if an LPTV station can operate successfully in an analog mode, no additional interference potential will arise if the station converts to digital operation with a 7-10 dB power reduction. The Commission should encourage LPTV conversion to digital operation and should grant digital applications immediately -- at least when they propose on-channel conversion -- rather than awaiting another rule making.

### **New Permanent Class of Station**

26. On-channel conversion by an LPTV station to digital operation would leave that station licensed on a secondary basis under the Commission's present rules. As urged by CBA earlier in this proceeding, the Commission must commence a rule making proceeding early on to allow LPTV stations that are willing to meet full power operating standards the opportunity to obtain primary status. The value of the public service provided by LPTV stations, as well as the large financial investment in those stations, must be recognized and protected as soon as possible.

### **Secondary Status Issue**

27. Those opposing relief for LPTV stations or urging that no special accommodations be made for displaced LPTV stations repeatedly argue that LPTV stations are secondary

---

<sup>18/</sup> Such stations would abandon their analog operations.

spectrum users and must yield to any and all primary uses. They often cite *Polar Broadcasting, et al. v. FCC*, 3 F.3d 1184 (1994) to support their position. The *Polar* case is not in any way dispositive, however, because it was decided in an entirely different environment than exists today. It is one thing for an LPTV station to have to move to a different channel to accommodate the construction of a new full power station when full power stations are being built one by one; that kind of displacement was clearly contemplated when the LPTV industry was first created in BC Docket No. 78-253.<sup>19/</sup> The situation now is entirely different, in several respects that were in no one's mind in 1982 and thus could not have been anticipated by LPTV operators who accepted licenses under the rules adopted in that proceeding: (a) the Commission has in one wholesale action doubled the number of television channel allotments without regard to market growth or the demand for more full power service; (b) the Commission has significantly reduced the total number of channels available for television broadcasting and thus the channels available for displacement relief; and (c) the Commission has essentially created an entirely new digital service rather than simply allowing the existing analog service to expand over time. Different factual situations call for different remedies.<sup>20/</sup>

28. Because of all these differences, which significantly restrict the ability of LPTV operators to survive when they are displaced, the Commission must undertake every effort to

---

<sup>19/</sup> 47 FR 21468, 51 RR 2d 476 (1992).

<sup>20/</sup> A critical distinction between the situation today and the situation when the LPTV rules were adopted in 1982 is that in 1982, the Commission noted that if a new full power allotment displaced a low power station, the LPTV operator could always apply and compete for the new full power channel. *Report and Order* in BC Docket No. 78-253, 51 RR 2d 476, 488-498 at n. 23 (1982). That is not true in this proceeding; LPTV operators are not permitted to protect themselves by competing with their full power counterparts for digital channels. Thus a critical self-help escape has been removed.


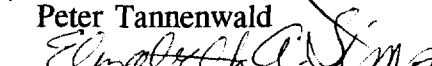
facilitate survival. And if in the end a station cannot survive, its owner should be compensated for the loss, either from auction funds or from the displacing full power station.<sup>21/</sup>

### Conclusion

29. CBA appreciates the genuine concern about the LPTV industry expressed by Commissioners and many members of the Staff in conversations during the past several months. However, talk is not enough; action is required to solve problems that are real. As demonstrated by this Petition for Reconsideration, effective remedial action is possible. The allotment table does not have to ignore LPTV stations in order to provide a digital channel for every full power NTSC station.<sup>22/</sup> The new 19 dB protection rule must be modified. Early displacement relief must be provided for those who want it, as well as an opportunity to increase power. Channels 60-69 must be used to relieve pressure during the transition process. LPTV stations should have an opportunity to achieve permanent status, and those that unavoidably perish should be compensated.

Irwin, Campbell & Tannenwald, P.C.  
1730 Rhode Island Ave., N.W., Suite 200  
Washington, DC 20036-3101  
Tel. 202-728-0400  
Fax 202-728-0354

Respectfully submitted,

  
Peter Tannenwald  
  
Elizabeth A. Sims

Counsel for the Community  
Broadcasters Association

June 13, 1997

---

<sup>21/</sup> There is precedent for compensation for spectrum displacement in the payments by Personal Communications Service licensees to the Operational Fixed Private Microwave stations they displace.

<sup>22/</sup> CBA's proposed allotment table does not utilize Channels 60-69 except when no other alternative is available to accommodate a full power station -- the same approach used by the Commission in its own table.



## **APPENDIX A**

### **CBA PROPOSED DIGITAL ALLOTMENT TABLE**

Note: An asterisk in the left column represents a protected low power television station.

Note: The legend at the bottom of each page indicates a total of 36 pages. There are only 35 pages.

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
1 AK ANCHORAGE		2	18	4.46	.00	4.46
2 AK ANCHORAGE		4	20	6.25	.00	6.25
3 AK ANCHORAGE		5	22	8.03	.00	8.03
4 AK ANCHORAGE		7	24	9.82	.00	9.82
5 AK ANCHORAGE		9	26	11.61	.00	11.61
6 AK ANCHORAGE		11	28	13.39	.00	13.39
7 AK ANCHORAGE		13	30	15.18	.00	15.18
8 AK ANCHORAGE		33	32	.00	.00	.00
9 AK BETHEL		4	3	.00	.00	.00
10 AK DILLINGHAM	(2)	2	9	.00	.00	.00
14 AK FAIRBANKS		11	26	11.61	.00	11.61
15 AK FAIRBANKS		13	28	13.39	.00	13.39
11 AK FAIRBANKS		2	18	4.46	.00	4.46
12 AK FAIRBANKS		7	22	8.03	.00	8.03
13 AK FAIRBANKS		9	24	9.82	.00	9.82
17 AK JUNEAU		8	11	820.62	.00	820.62
16 AK JUNEAU		3	6	1620.33	.00	1620.33
18 AK KETCHIKAN		4	13	803.39	.00	803.39
19 AK KETCHIKAN	(9)	9	8	800.00	.00	800.00
20 AK NORTH POLE		4	20	6.25	.00	6.25
21 AK SITKA		13	2	.00	.00	.00
* 1656 AL ALEXANDER CITY		64				
22 AL ANNISTON		40	58	1040.18	.00	1040.18
* 1657 AL ATHENS		28				
* 1659 AL BERRY		63				
* 1658 AL BERRY		58				
23 AL BESSEMER		17	18	1.06	.02	1.08
* 1660 AL BIRMINGHAM		34				
28 AL BIRMINGHAM		68	36	1020.53	3.07	1023.60
24 AL BIRMINGHAM		6	50	33.09	.08	33.17
25 AL BIRMINGHAM		10	53	1169.52	.00	1169.52
26 AL BIRMINGHAM		13	52	1034.82	.00	1034.82
27 AL BIRMINGHAM		42	30	23.06	.00	23.06
* 1661 AL CULLMAN		52				
* 1662 AL DECATUR		43				
29 AL DEMOPOLIS		41	19	7.53	.00	7.53
31 AL DOTHAN		18	21	8.85	1.22	10.08
30 AL DOTHAN		4	36	26.44	.67	27.11
32 AL DOZIER		2	59	43.44	.00	43.44
* 1665 AL FLORENCE		3				
* 1666 AL FLORENCE		5				
33 AL FLORENCE		15	14	1.73	2.85	4.58
34 AL FLORENCE		26	20	6.25	.20	6.46
35 AL FLORENCE		36	22	8.03	.00	8.03
36 AL GADSDEN		44	45	12.47	2.88	15.34
37 AL GADSDEN		60	26	1011.61	4.20	1015.81
38 AL HOMEWOOD		21	28	1013.39	.00	1013.39
43 AL HUNTSVILLE		54	41	25.03	1.30	26.34
39 AL HUNTSVILLE		19	59	1041.07	.00	1041.07
40 AL HUNTSVILLE		25	24	.00	1.63	1.63
41 AL HUNTSVILLE		31	32	.29	.00	.29
42 AL HUNTSVILLE		48	49	.00	1.31	1.31
44 AL LOUISVILLE		43	42	1.29	.00	1.29
* 1667 AL MOBILE		52				
46 AL MOBILE		10	9	1199.96	.00	1199.96
47 AL MOBILE		15	26	11.99	.00	11.99
48 AL MOBILE		21	20	.06	.00	.06
49 AL MOBILE		42	18	4.47	2.38	6.85
45 AL MOBILE		5	27	13.43	.00	13.43

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
* 1668	AL MONTGOMERY	39				
52	AL MONTGOMERY	26	14	1.05	2.85	3.91
53	AL MONTGOMERY	32	51	35.51	3.16	38.67
54	AL MONTGOMERY	45	46	.12	.00	.12
50	AL MONTGOMERY	12	57	42.53	.00	42.53
51	AL MONTGOMERY	20	16	2.89	7.37	10.26
55	AL MOUNT CHEAHA	7	56	39.79	.00	39.79
56	AL OPELIKA	66	31	19.86	.22	20.08
57	AL OZARK	34	33	.96	.00	.96
* 1669	AL RUSSELLVILLE	59				
58	AL SELMA	8	55	37.86	.00	37.86
59	AL TROY	67	48	31.63	.28	31.91
60	AL TUSCALOOSA	33	34	1000.00	.01	1000.01
* 1673	AL TUSCUMBIA	46				
61	AL TUSKEGEE	22	24	1009.82	.59	1010.41
62	AR ARKADELPHIA	9	46	32.57	1.28	33.85
* 1674	AR BENTONVILLE	14				
63	AR EL DORADO	10	27	15.18	.00	15.18
* 1678	AR EUREKA SPRINGS	18				
* 1680	AR FAYETTEVILLE	36				
64	AR FAYETTEVILLE	13	45	1200.00	.00	1200.00
65	AR FAYETTEVILLE	29	15	2201.78	.13	2201.92
* 1683	AR FORT SMITH	46				
67	AR FORT SMITH	24	17	1103.94	.00	1103.94
68	AR FORT SMITH	40	21	7.49	.00	7.49
66	AR FORT SMITH	5	18	1004.46	.00	1004.46
* 1681	AR FORT SMITH	32				
* 1682	AR FORT SMITH	36				
* 1685	AR HARRISON	23				
* 1687	AR HINDSVILLE	59				
69	AR HOT SPRINGS	26	14	1.84	.00	1.84
72	AR JONESBORO	48	49	.43	.00	.43
70	AR JONESBORO	8	58	40.18	.00	40.18
71	AR JONESBORO	19	20	.00	.20	.20
73	AR LITTLE ROCK	2	47	30.36	.00	30.36
74	AR LITTLE ROCK	4	32	42.84	.00	42.84
75	AR LITTLE ROCK	7	22	8.14	.00	8.14
* 1690	AR LITTLE ROCK	42				
76	AR LITTLE ROCK	11	12	1051.25	.00	1051.25
77	AR LITTLE ROCK	16	33	20.43	.00	20.43
78	AR LITTLE ROCK	42	43	1200.00	.07	1200.07
* 1692	AR LITTLE ROCK, ETC.	28				
* 1691	AR LITTLE ROCK, ETC.	13				
* 1693	AR MAGAZINE MOUNTAIN	60				
79	AR MOUNTAIN VIEW	6	35	20.68	.00	20.68
80	AR NEWARK	17	26	11.90	4.24	16.15
* 1694	AR PINE BLUFF	65				
81	AR PINE BLUFF	25	24	.37	.00	.37
82	AR PINE BLUFF	38	39	1.95	4.82	6.76
83	AR ROGERS	51	50	1000.00	.07	1000.07
* 1696	AR SILOAM SPRINGS	69				
* 1698	AR SPRINGDALE	20				
84	AR SPRINGDALE	57	39	1023.21	4.82	1028.03
* 1697	AR SPRINGDALE	15				
* 1699	AR WINSLOW	63				
* 1700	AZ BULLHEAD CITY	18				
* 1704	AZ DOUGLAS	28				
* 1703	AZ DOUGLAS	3				
85	AZ FLAGSTAFF	2	22	1008.03	.00	1008.03

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
86	AZ FLAGSTAFF	4	18	8.92	.00	8.92
87	AZ FLAGSTAFF	9	28	13.39	.00	13.39
88	AZ FLAGSTAFF	13	27	21.70	.00	21.70
* 1706	AZ FLAGSTAFF/DONEY PARK	6				
89	AZ GREEN VALLEY	46	47	.00	.00	.00
* 1707	AZ HILLTOP	36				
90	AZ KINGMAN	6	19	1199.99	.00	1199.99
* 1709	AZ LAKE HAVASU CITY	23				
91	AZ LAKE HAVASU CITY	34	35	1188.41	.00	1188.41
92	AZ MESA	12	36	21.96	.00	21.96
93	AZ NOGALES	11	25	1800.00	.00	1800.00
* 1712	AZ PAYSON	22				
102	AZ PHOENIX	61	49	32.14	.00	32.14
94	AZ PHOENIX	3	24	14.57	.00	14.57
95	AZ PHOENIX	5	17	3.59	.00	3.59
96	AZ PHOENIX	8	29	18.17	.00	18.17
* 1713	AZ PHOENIX	27				
* 1714	AZ PHOENIX	31				
* 1716	AZ PHOENIX	64				
97	AZ PHOENIX	10	23	11.53	.00	11.53
98	AZ PHOENIX	15	14	5.40	.00	5.40
99	AZ PHOENIX	21	20	.43	.00	.43
100	AZ PHOENIX	33	34	.54	.00	.54
101	AZ PHOENIX	45	26	27.61	.00	27.61
103	AZ PRESCOTT	7	25	10.71	.00	10.71
104	AZ SIERRA VISTA	58	44	27.68	.00	27.68
105	AZ TOLLESON	51	52	.00	.00	.00
106	AZ TUCSON	4	31	54.72	.00	54.72
107	AZ TUCSON	6	30	16.20	.00	16.20
108	AZ TUCSON	9	35	19.84	.00	19.84
109	AZ TUCSON	13	32	16.96	.00	16.96
110	AZ TUCSON	18	19	7.62	.00	7.62
* 1717	AZ TUCSON	14				
* 1718	AZ TUCSON	25				
111	AZ TUCSON	27	28	1000.00	.00	1000.00
112	AZ TUCSON	40	41	.00	.00	.00
113	AZ YUMA	11	41	25.00	.00	25.00
114	AZ YUMA	13	16	9.60	.00	9.60
115	CA ANAHEIM	56	32	21.00	.14	21.14
116	CA ARCATA	23	22	.35	.98	1.33
* 1719	CA ARROYO GRANDE	66				
* 1721	CA BAKERSFIELD	58				
117	CA BAKERSFIELD	17	25	11.76	.00	11.76
118	CA BAKERSFIELD	23	10	.86	.00	.86
119	CA BAKERSFIELD	29	33	17.86	.00	17.86
120	CA BAKERSFIELD	45	55	37.50	.00	37.50
121	CA BARSTOW	64	44	52.20	89.90	142.10
122	CA CALIPATRIA	54	50	33.27	.00	33.27
* 1722	CA CATHEDRAL CITY, ETC.	58				
123	CA CERES	23	15	1071.83	13.61	1085.43
124	CA CHICO	12	43	26.78	.00	26.78
125	CA CHICO	24	36	21.31	.00	21.31
126	CA CLOVIS	43	44	.37	.86	1.24
127	CA CONCORD	42	63	826.72	.00	826.72
128	CA CORONA	52	39	2223.17	.00	2223.17
129	CA COTATI	22	23	9.13	149.58	158.71
130	CA EL CENTRO	7	22	8.42	.00	8.42
131	CA EL CENTRO	9	48	31.25	.28	31.53
* 1723	CA ESCONDIDO	61				

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
135	CA EUREKA	29	28	.16	.00	.16
132	CA EUREKA	3	16	6.01	.00	6.01
133	CA EUREKA	6	17	6.87	.00	6.87
134	CA EUREKA	13	11	.00	.00	.00
136	CA FORT BRAGG	8	15	1.79	.00	1.79
137	CA FRESNO	18	40	1024.11	.00	1024.11
138	CA FRESNO	24	16	23.73	.00	23.73
139	CA FRESNO	30	9	3.77	.00	3.77
* 1724	CA FRESNO	34				
* 1725	CA FRESNO	69				
140	CA FRESNO	47	14	7.65	.00	7.65
141	CA FRESNO	53	7	4.78	.00	4.78
142	CA HANFORD	21	20	3.64	.00	3.64
143	CA HUNTINGTON BEACH	50	48	31.25	5.07	36.33
* 1726	CA LOS ANGELES	38				
148	CA LOS ANGELES	9	43	32.63	89.04	121.67
149	CA LOS ANGELES	11	65	1012.09	.00	1012.09
150	CA LOS ANGELES	13	66	1800.00	.00	1800.00
151	CA LOS ANGELES	22	42	1025.89	.00	1025.89
152	CA LOS ANGELES	28	59	41.50	.00	41.50
153	CA LOS ANGELES	34	35	.77	.00	.77
154	CA LOS ANGELES	58	41	27.45	.00	27.45
144	CA LOS ANGELES	2	60	804.76	.00	804.76
145	CA LOS ANGELES	4	36	60.25	.00	60.25
146	CA LOS ANGELES	5	68	801.42	.00	801.42
147	CA LOS ANGELES	7	8	126.65	.00	126.65
* 1727	CA LOS ANGELES, ETC.	38				
155	CA MERCED	51	38	34.09	.00	34.09
156	CA MODESTO	19	18	200.00	.00	200.00
158	CA MONTEREY	67	31	772.48	.00	772.48
157	CA MONTEREY	46	32	2216.95	.00	2216.95
159	CA NOVATO	68	47	37.05	.00	37.05
* 1728	CA O'NEALS	66				
160	CA OAKLAND	2	56	44.39	.00	44.39
161	CA ONTARIO	46	47	.37	.00	.37
* 1729	CA OXNARD	24				
162	CA OXNARD	63	24	1009.82	.00	1009.82
164	CA PALM SPRINGS	42	52	1034.82	.00	1034.82
163	CA PALM SPRINGS	36	46	47.21	.00	47.21
165	CA PARADISE	30	20	7.34	.00	7.34
* 1730	CA PLACERVILLE	62				
* 1731	CA PLANADA	63				
166	CA PORTERVILLE	61	48	34.27	5.07	39.35
167	CA RANCHO PALOS VERDES	44	51	2172.61	.00	2172.61
* 1732	CA REDDING	34				
168	CA REDDING	7	14	.89	.00	.89
169	CA REDDING	9	18	4.46	.89	5.35
* 1733	CA REDLANDS	66				
170	CA RIVERSIDE	62	69	852.36	.00	852.36
173	CA SACRAMENTO	10	61	1193.17	35.74	1228.91
174	CA SACRAMENTO	29	48	1031.25	.04	1031.29
175	CA SACRAMENTO	31	21	51.86	.00	51.86
176	CA SACRAMENTO	40	55	278.60	.00	278.60
* 1734	CA SACRAMENTO	25				
171	CA SACRAMENTO	3	35	332.34	.00	332.34
172	CA SACRAMENTO	6	53	278.60	18.00	296.61
177	CA SALINAS	8	43	243.04	.00	243.04
178	CA SALINAS	35	13	63.72	20.34	84.06
* 1735	CA SALINAS-MONTEREY, ET	33				

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
180	CA SAN BERNARDINO	24	26	13.11	.00	13.11
181	CA SAN BERNARDINO	30	38	1022.32	.01	1022.33
179	CA SAN BERNARDINO	18	61	1802.95	.00	1802.95
183	CA SAN DIEGO	10	25	13.54	.00	13.54
184	CA SAN DIEGO	15	30	75.75	.00	75.75
185	CA SAN DIEGO	39	40	37.08	.00	37.08
186	CA SAN DIEGO	51	18	77.89	.00	77.89
187	CA SAN DIEGO	69	19	49.83	.00	49.83
182	CA SAN DIEGO	8	55	40.72	.00	40.72
* 1736	CA SAN FERNANDO VALLEY	24				
194	CA SAN FRANCISCO	26	27	.14	.00	.14
195	CA SAN FRANCISCO	32	33	1000.00	.29	1000.29
196	CA SAN FRANCISCO	38	39	.44	.00	.44
197	CA SAN FRANCISCO	44	45	.02	.00	.02
188	CA SAN FRANCISCO	4	57	47.22	.00	47.22
189	CA SAN FRANCISCO	5	28	14.19	88.42	102.61
190	CA SAN FRANCISCO	7	24	30.19	141.21	171.40
191	CA SAN FRANCISCO	9	34	20.79	.16	20.94
192	CA SAN FRANCISCO	14	29	1120.48	88.42	1208.90
193	CA SAN FRANCISCO	20	19	56.24	.00	56.24
* 1737	CA SAN FRANCISCO, ETC.	30				
200	CA SAN JOSE	48	49	.02	.00	.02
201	CA SAN JOSE	54	50	1033.04	.65	1033.69
202	CA SAN JOSE	65	41	813.28	.00	813.28
198	CA SAN JOSE	11	12	30.52	20.34	50.86
199	CA SAN JOSE	36	52	35.04	18.00	53.04
204	CA SAN LUIS OBISPO	33	34	.77	.16	.93
203	CA SAN LUIS OBISPO	6	15	1.78	11.29	13.07
* 1738	CA SAN MARCOS	43				
205	CA SAN MATEO	60	59	.75	.00	.75
206	CA SANGER	59	36	23.80	.00	23.80
207	CA SANTA ANA	40	53	40.06	.00	40.06
208	CA SANTA BARBARA	3	27	12.50	.00	12.50
* 1739	CA SANTA CLARA-SAN JOSE	22				
209	CA SANTA MARIA	12	19	23.81	.00	23.81
210	CA SANTA ROSA	50	54	1036.61	.00	1036.61
213	CA STOCKTON	64	62	1800.00	35.74	1835.74
211	CA STOCKTON	13	25	1010.71	.00	1010.71
212	CA STOCKTON	58	46	51.76	.00	51.76
* 1740	CA TEMECULA, ETC.	67				
* 1741	CA TULARE	40				
214	CA TWENTYNINE PALMS	31	23	77.22	.00	77.22
215	CA VALLEJO	66	30	1015.18	88.42	1103.59
* 1742	CA VAN NUYS	38				
216	CA VENTURA	57	49	35.69	.00	35.69
217	CA VISALIA	26	28	17.26	.00	17.26
218	CA VISALIA	49	50	.11	.65	.76
219	CA WATSONVILLE	25	58	73.20	.00	73.20
220	CO BOULDER	14	15	911.23	.13	911.36
* 1745	CO BOULDER	38				
221	CO BROOMFIELD	12	36	21.93	.00	21.93
222	CO CASTLE ROCK	53	47	30.39	.00	30.39
223	CO COLORADO SPRINGS	11	10	2.95	8.71	11.66
224	CO COLORADO SPRINGS	13	24	9.90	.00	9.90
225	CO COLORADO SPRINGS	21	22	4.09	.00	4.09
230	CO DENVER	9	16	1002.68	4.79	1007.47
231	CO DENVER	20	19	.00	.00	.00
232	CO DENVER	31	32	.01	.00	.01
233	CO DENVER	41	40	.05	.00	.05

# COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
234	CO DENVER	50	51	.19	.00	.19
235	CO DENVER	59	44	1027.68	.00	1027.68
226	CO DENVER	2	34	19.28	.00	19.28
227	CO DENVER	4	35	1019.64	.00	1019.64
228	CO DENVER	6	18	5.15	.00	5.15
229	CO DENVER	7	17	1133.82	.00	1133.82
236	CO DURANGO	6	17	3.58	6.92	10.51
* 1748	CO ESTES PARK	16				
237	CO FORT COLLINS	22	21	2.24	.00	2.24
* 1749	CO FORT COLLINS	35				
238	CO GLENWOOD SPRINGS	3	23	8.93	.00	8.93
* 1750	CO GLENWOOD SPRINGS	5				
243	CO GRAND JUNCTION	18	16	2.68	4.79	7.47
239	CO GRAND JUNCTION	4	15	1.81	5.58	7.39
240	CO GRAND JUNCTION	5	2	.05	.00	.05
241	CO GRAND JUNCTION	8	7	.86	.00	.86
242	CO GRAND JUNCTION	11	14	.95	.00	.95
* 1751	CO GRAND VALLEY	13				
* 1752	CO IDAHO SPRINGS	44				
244	CO LONGMONT	25	26	.19	.00	.19
245	CO MONTROSE	10	13	1000.00	.00	1000.00
* 1753	CO NEW CASTLE, ETC.	5				
246	CO PUEBLO	5	27	14.01	.00	14.01
247	CO PUEBLO	8	29	14.31	.00	14.31
* 1754	CO RULISON, ETC.	66				
* 1755	CO SILT, ETC.	47				
248	CO STEAMBOAT SPRINGS	24	10	.00	8.71	8.71
249	CO STERLING	3	23	8.93	.00	8.93
250	CT BRIDGEPORT	43	42	1000.00	66.86	1066.86
251	CT BRIDGEPORT	49	52	1199.98	96.07	1296.04
* 1756	CT DANBURY	22				
255	CT HARTFORD	61	5	1000.00	.00	1000.00
252	CT HARTFORD	3	11	94.63	6.36	100.99
253	CT HARTFORD	18	46	1029.46	128.25	1157.71
254	CT HARTFORD	24	32	17.01	1000.00	1017.02
256	CT NEW BRITAIN	30	35	19.89	1110.99	1130.89
259	CT NEW HAVEN	65	39	1023.21	1000.00	2023.21
257	CT NEW HAVEN	8	10	1000.00	.00	1000.00
258	CT NEW HAVEN	59	6	1200.00	.00	1200.00
260	CT NEW LONDON	26	34	19.09	195.57	214.66
261	CT NORWICH	53	45	34.29	188.13	222.42
262	CT WATERBURY	20	12	1000.00	.00	1000.00
* 1757	CT WEST HAVEN	28				
265	DC WASHINGTON	7	39	29.38	71.95	101.33
266	DC WASHINGTON	9	34	20.29	50.95	71.23
267	DC WASHINGTON	20	35	36.94	.00	36.94
268	DC WASHINGTON	26	27	1000.00	49.86	1049.86
* 1758	DC WASHINGTON	58				
* 1759	DC WASHINGTON	64				
269	DC WASHINGTON	32	33	1000.00	13.69	1013.69
270	DC WASHINGTON	50	51	11.55	42.98	54.53
263	DC WASHINGTON	4	48	61.62	.55	62.17
264	DC WASHINGTON	5	6	592.05	.00	592.05
271	DE SEAFORD	64	44	27.68	31.92	59.60
* 1760	DE TALLEYVILLE	55				
273	DE WILMINGTON	61	31	36.96	54.84	91.79
272	DE WILMINGTON	12	55	1037.50	16.67	1054.17
274	FL BOCA RATON	63	44	27.92	.00	27.92
275	FL BRADENTON	66	42	31.57	.00	31.57

## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
276	FL CAPE CORAL	36	35	7.94	.00	7.94
277	FL CLEARWATER	22	21	1199.99	.00	1199.99
278	FL CLERMONT	18	17	9.52	.00	9.52
280	FL COCOA	68	30	19.93	5.26	25.19
279	FL COCOA	52	51	7.64	.00	7.64
282	FL DAYTONA BEACH	26	49	1032.14	.30	1032.44
281	FL DAYTONA BEACH	2	11	18.68	.00	18.68
* 1761	FL DE FUNIAK SPRINGS	24				
* 1762	FL DESTIN	48				
283	FL FORT LAUDERDALE	51	52	.00	3.41	3.41
* 1764	FL FORT LAUDERDALE	27				
* 1766	FL FORT MYERS	67				
285	FL FORT MYERS	20	15	39.75	.00	39.75
286	FL FORT MYERS	30	31	.00	1.96	1.96
284	FL FORT MYERS	11	53	35.92	.00	35.92
* 1765	FL FORT MYERS	7				
288	FL FORT PIERCE	34	50	41.66	.00	41.66
287	FL FORT PIERCE	21	38	23.61	.00	23.61
289	FL FORT WALTON BEACH	35	25	1199.99	1.96	1201.95
290	FL FORT WALTON BEACH	53	40	1195.02	.00	1195.02
291	FL FORT WALTON BEACH	58	49	774.11	3.67	777.78
293	FL GAINESVILLE	20	16	5.65	.00	5.65
292	FL GAINESVILLE	5	36	1020.53	.00	1020.53
294	FL HIGH SPRINGS	53	28	17.37	.00	17.37
295	FL HOLLYWOOD	69	47	30.36	1.51	31.86
298	FL JACKSONVILLE	12	13	3.46	.00	3.46
299	FL JACKSONVILLE	17	34	21.58	3.41	25.00
300	FL JACKSONVILLE	30	32	17.00	1.37	18.38
301	FL JACKSONVILLE	47	19	5.90	4.33	10.23
* 1767	FL JACKSONVILLE	36				
* 1768	FL JACKSONVILLE	41				
302	FL JACKSONVILLE	59	44	28.44	2.58	31.02
296	FL JACKSONVILLE	4	42	962.69	.00	962.69
297	FL JACKSONVILLE	7	38	29.09	.00	29.09
304	FL KEY WEST	22	3	.00	.00	.00
303	FL KEY WEST	8	12	.02	.00	.02
* 1769	FL KISSIMMEE	40				
* 1770	FL LAKE CITY	23				
* 1771	FL LAKE CITY	48				
305	FL LAKE WORTH	67	36	1020.53	.00	1020.53
306	FL LAKELAND	32	19	1200.00	4.85	1204.85
* 1772	FL LAKELAND	14				
308	FL LEESBURG	55	40	1024.11	.00	1024.11
307	FL LEESBURG	45	46	.00	.00	.00
309	FL LIVE OAK	57	48	1031.25	.00	1031.25
311	FL MELBOURNE	56	48	31.32	.00	31.32
310	FL MELBOURNE	43	20	12.83	5.37	18.20
313	FL MIAMI	4	22	1199.75	.43	1200.18
314	FL MIAMI	6	30	1198.06	5.26	1203.32
315	FL MIAMI	7	8	3.72	.00	3.72
316	FL MIAMI	10	9	1.65	.00	1.65
317	FL MIAMI	17	18	.00	.00	.00
318	FL MIAMI	23	24	.21	.00	.21
319	FL MIAMI	33	32	.28	.00	.28
320	FL MIAMI	35	21	1007.14	.00	1007.14
* 1775	FL MIAMI	21				
* 1776	FL MIAMI	41				
321	FL MIAMI	39	20	1199.75	5.37	1205.12
322	FL MIAMI	45	46	1000.00	.00	1000.00



## COST OF NEW ASSIGNMENTS

sta	city	cur NTSC	new DTV	base cost	mutual cost	combined
312 FL MIAMI		2	19	6.74	4.85	11.59
* 1777 FL NAPLES		2				
* 1778 FL NAPLES		9				
324 FL NAPLES		46	45	1000.00	.00	1000.00
323 FL NAPLES		26	43	26.79	.00	26.79
325 FL NEW SMYRNA BEACH		15	33	18.35	4.51	22.86
326 FL OCALA		51	31	16.25	1.96	18.21
327 FL ORANGE PARK		25	10	1.51	.00	1.51
331 FL ORLANDO		27	14	1000.89	.00	1000.89
332 FL ORLANDO		35	22	1008.03	.43	1008.47
333 FL ORLANDO		65	41	1200.00	.00	1200.00
328 FL ORLANDO		6	58	40.65	.00	40.65
329 FL ORLANDO		9	39	1200.00	.00	1200.00
330 FL ORLANDO		24	23	1.00	.00	1.00
* 1779 FL PALATKA		49				
334 FL PALM BEACH		61	49	38.50	.30	38.80
* 1780 FL PANAMA CITY		22				
335 FL PANAMA CITY		7	41	25.09	.00	25.09
336 FL PANAMA CITY		13	19	7.14	.00	7.14
337 FL PANAMA CITY		28	29	.00	.00	.00
338 FL PANAMA CITY		56	38	22.57	.00	22.57
339 FL PANAMA CITY BEACH		46	47	1199.34	8.81	1208.15
343 FL PENSACOLA		44	45	.27	.00	.27
340 FL PENSACOLA		3	17	8.79	.00	8.79
* 1781 FL PENSACOLA		8				
* 1782 FL PENSACOLA		12				
* 1783 FL PENSACOLA		31				
* 1784 FL PENSACOLA		39				
341 FL PENSACOLA		23	31	1016.07	10.70	1026.77
342 FL PENSACOLA		33	34	1.19	.01	1.20
344 FL SARASOTA		40	52	36.00	3.41	39.41
* 1785 FL SEBRING		60				
* 1786 FL ST. AUGUSTINE		22				
* 1788 FL ST. PETERSBURG		60				
347 FL ST. PETERSBURG		44	59	1200.00	.00	1200.00
345 FL ST. PETERSBURG		10	24	1009.82	.00	1009.82
346 FL ST. PETERSBURG		38	57	1039.29	.00	1039.29
* 1787 FL ST. PETERSBURG		24				
* 1789 FL STUART		16				
* 1791 FL TALLAHASSEE		65				
350 FL TALLAHASSEE		40	2	2.43	.00	2.43
348 FL TALLAHASSEE		11	32	22.33	2.46	24.80
349 FL TALLAHASSEE		27	22	11.07	.00	11.07
352 FL TAMPA		8	7	1000.00	.00	1000.00
353 FL TAMPA		13	12	11.06	.00	11.06
354 FL TAMPA		16	34	23.08	3.41	26.49
* 1792 FL TAMPA		18				
* 1793 FL TAMPA		57				
* 1794 FL TAMPA		68				
355 FL TAMPA		28	29	2.89	.00	2.89
356 FL TAMPA		50	47	30.67	1.51	32.17
351 FL TAMPA		3	54	37.92	.00	37.92
* 1795 FL TAMPA-ST. PETERSBURG		20				
357 FL TEQUESTA		25	16	1002.68	.00	1002.68
358 FL TICE		49	33	21.95	4.51	26.46
359 FL VENICE		62	25	425.26	.00	425.26
* 1796 FL VERO BEACH		10				
* 1797 FL WEST PALM BEACH		36				
361 FL WEST PALM BEACH		12	13	11.58	.00	11.58